

Mark McAlester

From: Mark McAlester
Sent: Tuesday, June 4, 2024 6:17 PM
To: Kayla Petsch; Denise Abston
Cc: Grant Gibson; Dawn Neal; Mike McMillin; Janet Tribble; Denise Abston
Subject: RE: Anders v. Petco (Comanche County)

Kayla,

I will review the request for these documents, and check with Petco regarding the items. At this time we would suggest rescheduling the depo set for Thursday to a later date in order that we can address any additional or outstanding requests. Also, in regard to the depo notice issued by plaintiff, please be advised that the witness we have identified that is located in Oklahoma can address the following items contained in the notice:

I. Management Structure

1. The management structure at the Petco store in Lawton;
4. The identity and responsibilities of store employees at the Lawton location;

III. Risk Analysis

1. Process for evaluating slip and falls at the Lawton store;
9. Document retention – for the Lawton store;
10. for the time period of April, 2023 to present;
18. Safety policy and procedures for the store;
19. Same as 18;
22. Inspections for the Lawton store;
23. Safety policies and procedures for the Lawton store;
24. Supervision and following of policies for the Lawton store;
25. From April 16 forward for the Lawton store;

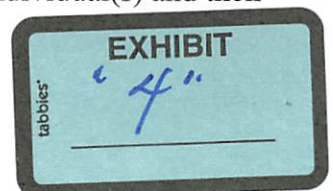
IV. Video Surveillance

1. Video and security system at the Lawton store;
2. Operation of the video system at the Lawton store;
3. Viewing the video at the Lawton store

V. Investigation

6. Employees who worked on the date of the accident;
7. Employee(s) who stocked the display at the store in Lawton
8. Policies for stocking at the Lawton store

Testimony regarding any other topics identified in the Notice, and to which Petco does not object, will require testimony from witness(es) who are located out of state. We are working to identify the individual(s) and their location(s).



Also, please note that Petco objects to the following topics contained in the deposition notice. Please let me know if you are agreeable to withdrawing questions relating to the below topics, or if we need to file a motion for protective order/motion to quash in regard to these issues:

Category I: (I)(3),(4),(5), and (7) as overly broad and irrelevant;

Category II: in its entirety;

Category III: (III)(3),(4),(5), (6), (7), (8), (10), (11), (12), (13), (14), (15), (16), (17), (22), (26);

Category IV: (IV)(6);

Category V: none;

Category VI: (1)

Category VII: none.

I was not able to make it back to the office this afternoon, but will be in all day tomorrow. Does 10:00 a.m. work for you for a call to discuss?

Thanks.

Mark

From: Kayla Petsch <kayla@parrishdevaughn.com>

Sent: Tuesday, June 4, 2024 12:54 PM

To: Denise Abston <dabston@fentonlaw.com>

Cc: Grant Gibson <Grant@parrishdevaughn.com>; Dawn Neal <dawn@pepperwins.com>; Mike McMillin <msmcmillin@fentonlaw.com>; Mark McAlester <jmmcalester@fentonlaw.com>; Janet Tribble <jtribble@fentonlaw.com>; Denise Abston <dabston@fentonlaw.com>

Subject: Re: Anders v. Petco (Comanche County)

We would like these other policies referenced in the attached screen grab of the document production.

Nothing was produced regarding stocking procedures or display protocols or standards.

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From: Denise Abston <dabston@fentonlaw.com>

Sent: Tuesday, June 4, 2024 9:10:43 AM

To: Kayla Petsch <kayla@parrishdevaughn.com>

Cc: Grant Gibson <Grant@parrishdevaughn.com>; Dawn Neal <dawn@pepperwins.com>; Mike McMillin <msmcmillin@fentonlaw.com>; Mark McAlester <jmmcalester@fentonlaw.com>; Janet Tribble <jtribble@fentonlaw.com>; Denise Abston <dabston@fentonlaw.com>

Subject: RE: Anders v. Petco (Comanche County)

Good morning Ms. Petsch:

Enclosed please find Defendant's supplemental document production.

DENISE J. ABSTON
Office Administrator and Paralegal
Fenton Fenton, Smith, Reneau & Moon
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Oklahoma City, OK 73102